

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Request for OMB Approval of Program Evaluation Survey
under Generic ICR #1860.01

FROM: David G. Byro, Small Business Liaison (3OR00)
Office of Reinvention

TO: Lynn Johnson, OECA Desk Officer
Regulatory Information Division, Office of Policy

The purpose of this memorandum is to forward our survey package for obtaining a clearance prior to seeking final approval from OMB. The title of the survey is: Survey of End-Users of Compliance Guide.

Section 215 of the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA) states that EPA may, in cooperation with States, develop guides “that fully integrate requirements of both Federal and State Regulations.” Consistent with that section, EPA Region III’s Business Assistance Center (BAC), in cooperation with the Small Business Assistance Program (SBAP) representatives of the states of MD, PA, VA, DE, WV and the District of Columbia agreed to work cooperatively to develop, promote and adopt a Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Guide to benefit small businesses. The Guide is being developed under a cooperative agreement with the Clean Air Council. In order to evaluate the effectiveness of the Guide, the attached survey form will be included in the Guide for voluntary response by the small business end-users.

We estimate that up to 400 surveys will be distributed along with the guides. Approximately 100 responses are expected.

If you have any questions or concerns about this request, please contact me at 215-814-5563 .

Attachments

MEMORANDUM

SUBJECT: Review of Compliance Assistance Regional Program Evaluation Survey,
ICR No. 1860.01 (OMB 2020-0015)

FROM: Lynn Johnson, OECA Desk Officer
Regulatory Information Division
Office of Policy

TO:

As a condition of OMB approval for the generic *Regional Compliance Assistance Program Evaluations* ICR, OMB Control No. 2020-0015, EPA agreed to submit each specific questionnaire covered by this clearance to OMB for review. Attached for your review and approval is a Region 3 survey form to be included in a VOC/HAP Compliance Guide developed under section 215 of the Small Business Regulatory Enforcement Fairness Act of 1996. The purpose of this survey is to assess the effectiveness of the Guide in helping facilities to comply and to determine possible areas for improvement.

Your comments and suggestions would be much appreciated. For comments or questions on the survey, please contact David G. Byro at 215-814-5563.

If you have any questions about the ICR or this survey submission, please contact me at 202-260-

Thank you for your cooperation in this matter.

Attachments

Request for Approval of Information Collection Activity

I. Background

Section 215 of the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA) states that EPA may, in cooperation with States, develop guides “that fully integrate requirements of both Federal and State Regulations.” Consistent with that section, EPA Region III’s Business Assistance Center (BAC), in cooperation with the Small Business Assistance Program (SBAP) representatives of the states of MD, PA, VA, DE, WV and the District of Columbia agreed to work cooperatively to develop, promote and adopt a Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Guide to benefit small businesses. The Guide is being developed under a cooperative agreement with the Clean Air Council. In order to evaluate the effectiveness of the Guide, the attached survey form will be included in the Guide for voluntary response by the small business end-users.

II. Survey Purpose and Description

EPA Region III’s Business Assistance Center (BAC) has a cooperative agreement with the Clean Air Council to develop the Guide. The purpose of this survey is to assess the effectiveness of the Guide in helping facilities to comply and to determine possible areas for improvement. The Guide will be completed by 10/30/99.

III. Survey Methodology and Use of Results

The potential target audience for the evaluation forms consists of numerous small business facilities covered by the air regulations in Region III. These include facilities such as dry cleaners, printers and chrome-electroplaters. We estimate that up to 400 facilities will receive the Guide. We expect responses from about 100 facilities. We estimate that it will take a respondent approximately 10 minutes to complete the survey form.

Region III and the states will use the feedback to make any needed improvements to the Guide and to communicate environmental results that have been achieved from the compliance assistance offered in the Guide.

IV. Respondents’ Burden

Number of Respondents:	100
Minutes per Response:	10 minutes x 100 = 1000 minutes = 17 hours
Cost per Hour:	*\$33.00
Total Burden:	17 Hours; \$561

* Based on Bureau of Labor Statistics “Employer Costs for Employment Compensation”. This is the estimate used in the generic ICR.

V. Agency Burden

EPA Staff Time:	20 hours
Cost per Hour:	\$35 **
Total Burden:	\$700

**This rate is based on a 1998 GS-13/01 salary of \$55,969 or \$26.91/hr with 30% overhead the hourly rate is \$34.98. This is the estimate used in the ICR.

SURVEY OF END-USERS OF VOC/HAP COMPLIANCE GUIDE

To: Small business owners and operators/managers
From: EPA / Clean Air Council

The authors are interested in your feedback on how this VOC / HAP Compliance Guide helped you to understand the regulations and how to operate your business in an environmentally responsible manner. Please take the time to answer a few questions which will help us to understand what is useful about this Guide and how it can be improved. When you are finished, just tear out this page and mail to: U.S. EPA Region III, Business Assistance Center, 1650 Arch St., Philadelphia, PA 19103.

1. In what state are your business facilities which have VOC or HAP emissions located?
(Circle one: Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia).
 2. What type of business do you operate? _____
 3. What was your level of knowledge about VOC/HAP rules before reading the guide?
(Rate on a scale of 1 to 6, with 1 being very knowledgeable)_____
 4. Did the guide improve your understanding of the VOC/HAP rules? (Rate on scale of 1 to 6, with 1 being highly improved)_____
 5. Did this guide help you determine whether your business is a "major source" of either VOC or HAPS? ____Yes ____No
 6. What portions of the guide did you find most helpful? _____

 7. Did you find a table or appendix at the back of the guide to be useful? _____

 8. Did you find the guide was written in a way that was easy to understand? (Rate on scale of 1 to 6, with 1 being very understandable)._____
- If some portions were difficult to understand, please identify them. _____

9. Did the reading of this guide prompt you to change any aspect of your business operation? If so, circle the ones that apply, and then please describe the changes made. (Installed equipment, substituted chemicals, changes process, applied for permit, started employee training program, began submitting reports or data to environmental agency, other).

10. Did the reading of this guide result in any improvement in the environmental performance of your business operation such as reducing your emissions and/or wastes? If so, please describe the improvements. _____

11. Which, if any, of the contacts provided in the guide did you communicate with?

12. Which, if any, of the web sites provided in the guide did you access?

13. How satisfied are you with the assistance this guide provided to your business? (Rate on a scale of 1 to 6, with 1 being completely satisfied) _____

Please state the reason for your response. _____

If you have comments about any other matter regarding this Guide, feel free to note them here.

Thank you for providing the Business Assistance Center with this valuable feedback.